

Message

From: Nam, Ed [nam.ed@epa.gov]
Sent: 3/26/2019 4:17:23 PM
To: Breneman, Sara [breneman.sara@epa.gov]; Dickens, Brian [dickens.brian@epa.gov]; Damico, Genevieve [damico.genevieve@epa.gov]
CC: Furey, Eileen [furey.eileen@epa.gov]; Mooney, John [Mooney.John@epa.gov]
Subject: Ohio O&G presentation

Sara, Brian, Genevieve

I took notes during Bob Hodanbosi's presentation here at AAPCA. I'm not sure if you'll find anything new here but I'm passing on my notes in case you find it helpful.

- Bob Hodanbosi
 - Finding that engines were being swapped out w/o new permit. Able to modify general permit without getting new permit, just need to report.
 - LDAR allowed for either method 21 or FLIR camera.
 - Finalize general permit after OOOOa. EPA recognized general permit as compliant. 888 permit apps from '11-'19! 885 issued so far. Overwhelming w/o general permit.
 - Inspections: large facilities annual. Medium every 3 yrs. Others as needed if complaints.
 - No significant citizen complaints. Mostly about compressor stations (noise/odors). Violations due to undersized equipment – not designed to handle the amount of “wet gas”. They get their blueprint from TX and may not be appropriate. Other violations include not operating controls on dehydration equipment, thief hatches, leaks, etc.
 - Ambient monitoring. Temporary monitoring (trailer to pick up PM VOC) around well sites during initial drilling phase – all coming up clean. Also: Markwest Fractionation plant large facility. Ambient monitoring in NW on farm which sunk into the mud and farm animals damaged equipment! Had to move so Markwest was ok with putting at front gate (they were confident that their operations was clean. Operating since July and haven't picked up significant emissions.

Ed